

Future Frontiers Privacy Notice

Last updated: 4th March 2022

Next scheduled review: October 2022

At Future Frontiers we take your privacy very seriously and are committed to processing data in accordance with our responsibility under UK General Data Protection Regulation (GDPR) and Privacy and Electronic Communications Regulations (PECR). We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

Future Frontiers collects and uses certain personal information about you. When we do so we are regulated as 'controller' of that data under UK GDPR.

Article 5 of GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The person responsible for our ongoing compliance with this policy is Dominic Baker, CEO, who will ensure this policy is regularly reviewed.

The personal information we collect and use

This policy applies to all personal data processed by Future Frontiers. All data collected and processed will be done under one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interest.

Volunteers

“Volunteers” of the Future Frontiers coaching programme are employees of our business partners who apply to be a coach on our programme.

| Type of data | Why we collect it | How we collect it | What do we do with it? | What is the legal basis? |
|--|--|-----------------------------|--|------------------------------|
| First and last name, work email address, work contact telephone number, employer and job role, education history, overseas address history | For the effective and safe delivery of the programme | Coach sign-up form | Hold it on our internal systems, use it to liaise with volunteers and pupils, use it to run Enhanced DBS checks, use it in the setup and delivery of the programme | Administration of a contract |
| Volunteer images, sound recordings and video clips | To allow us to demonstrate our programme in action to funders and other stakeholders | During and after Programmes | Hold on our systems and use to develop promotional materials | Consent |

The sharing of Volunteers’ data beyond what is necessary for the programme delivery will be outlined explicitly and Volunteers will be asked for their consent. We will not use Volunteers’ personal information for marketing purposes unless they specifically opt-in for this service or where there is legitimate interest that relates to current or previous engagement with Future Frontiers. We will never share personal information with any third parties unless this is necessary for the legitimate purposes of the charity or Volunteers explicitly opt-in to allow us to do this.

Data retention

We retain Volunteers’ data only for as long as is necessary for achieving the purpose for which we collected it. This is usually 2 years from commencement of the programme. After this, we will either delete or anonymise data so that Volunteers can no longer be identified. Individuals can withdraw their consent for us using their pictures at any time by emailing info@futurefrontiers.org.uk.

Students and Parents

“Students” who participate in our programme at school or in a business and “Parents” or guardians of the Student.

We take all reasonable steps to ensure the personal data we collect is relevant and limited to what is necessary in relation to the purpose for which that data is requested. Employee and volunteer access to information will be limited to what is necessary for them to undertake their roles delivering our programme and will be revoked when access is no longer required.

In some instances, we will rely on obtaining student and parent consent for use of their personal information. The legal basis for this is most commonly for where we would like to share your personal information with a partner (a ‘third party’) to track the impact of our programmes. We collect personal data, and sensitive personal data, about students for the following reasons and under the following legal bases:

| Type of data | Why we collect it | What do we do with it? | What is the legal basis? |
|---|--|---|------------------------------|
| Pupil name, DfE Unique Pupil Number, school name, date of birth | To administer the Future Frontiers programme | Hold it on our internal systems, use it to liaise with teachers and coaches | Administration of a contract |
| Pupil phone number and email, gender, parental history of higher education, prior and predicted attainment, school administration data including eligibility status for Pupil Premium, survey response data, dietary requirements | To evaluate, monitor and continually improve our programmes, to inform stakeholders of our impact and to determine to what extent we are fulfilling our charitable purpose and mission | Hold this on our internal systems, share it with certain partners to contact and track pupils' educational attainment in the future | Legitimate Interests |
| Parent phone number, email, address | | | |
| Pupil Ethnicity and Disability data (special categories of data) | To allow us to evaluate whether our programme has the same impact on pupils of different ethnicities and children with disabilities, and to enable us to make changes where this is not the case | Hold it on our systems for evaluation purposes, share with partner organisations if you have consented to us holding it | Consent |
| Pupil images, sound recordings and video clips | To allow us to demonstrate our programme in action to funders and other stakeholders | Hold on our systems and use in promotional materials | |

The organisations we share personal pupil data, pursuant to our legitimate interests, are charities and research bodies that support Future Frontiers.

Data retention

We retain Student and Parent data only for as long as is necessary for achieving the purpose for which we collected it. This is usually 4 years from commencement of the programme. After this, we will either delete or anonymise data so that Students and Parents can no longer be identified.

School contacts and Company contacts

“School contacts” who work at one of our eligible schools and who are involved in the Future Frontiers programme.

“Company contacts” who are employees at an eligible business and who are involved in the running of the Future Frontiers programme at that business.

Where communications are sent to contacts at companies or schools regarding relevant services provided by Future Frontiers, the option for the individual to opt out of communications is clearly available and systems are in place to ensure such revocation is reflected accurately in our systems. The data we collect as part of our direct marketing strategy is processed in accordance with Privacy and Electronic Communications Regulation.

| Type of data | Why we collect it | What do we do with it? | What is the legal basis? |
|--------------|-------------------|------------------------|--------------------------|
|--------------|-------------------|------------------------|--------------------------|

| | | | |
|---|--|---|----------------------|
| First and last name, school/business name, email, contact telephone number, regional location, partnership status | To administer the Future Frontiers programme. To make businesses and schools who may benefit from partnering with us aware of our programme | Hold it on our internal systems, use it to liaise with contacts | Legitimate Interests |
|---|--|---|----------------------|

Data retention

We retain School contact and Company contact data only for as long as is necessary for achieving the purpose for which we collected it.

Supporters

“Supporters” are individual donors and/or represent organisations which support or may support Future Frontiers.

We use information about current and potential supporters to raise funds for Future Frontiers, which are used to support young people to realise their potential. The legal basis for collecting and processing your data is under our legitimate interests as a charity. We may supplement what we know about individuals with information that is publicly available to contact you, carry out due diligence and/or to send tailored communications; when this is the case, we will let individuals know by sharing this Privacy Notice. Please note, if you opt out of collection and processing of your data for due diligence, we may not be able to accept donations from you.

| Type of data | Why we collect it | What do we do with it? | What is the legal basis? |
|--|--|---|--------------------------|
| Full name, organisation, role, contact email, contact telephone number, contact address, publicly available information about you, information you share about your interests and communication preferences. | To contact individuals/organisations who are current or potential supporters To raise funds | Hold it on our internal systems, use it to liaise with contacts | Legitimate Interests |

Data retention

We retain Supporters data only for as long as is necessary to achieve the purpose for which we collected it.

Stay Connected Subscribers

“Stay Connected Subscribers” who have signed up to receive emails from the charity, which may include news, events and opportunities to get involved in the programme, donate and fundraise. Please note, if you choose not to opt in to Future Frontiers Stay Connected, this will not impact on you continuing to receive other communications from Future Frontiers necessary for participating in our programmes.

| Type of data | Why we collect it | What do we do with it? | What is the legal basis? |
|--------------|-------------------|------------------------|--------------------------|
|--------------|-------------------|------------------------|--------------------------|

| | | | |
|--|--|--|---------|
| Full name, organisation, role, contact email, information you share about yourself, your connection to Future Frontiers, and your interests. | To contact individuals who choose to hear from the charity To raise funds | Hold it on our internal systems, use it to contact subscribers | Consent |
|--|--|--|---------|

Data retention

We retain Stay Connected Subscribers’ data only for as long as is necessary to achieve the purpose for which we collected it.

Sub-processors

Future Frontiers uses certain Sub-processors to assist it in delivering and evaluating our programme. Future Frontiers undertakes a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed Sub-processors that will or may have access to or process Personal Data. Below is a list of authorised Sub-processors used by Future Frontiers, and their corresponding data protection policies:

- **Vedamo**

Coaching sessions take place on the website Vedamo if they cannot be done in person. This requires our volunteers to sign up with some personal data and all sessions are recorded. These recordings will be securely retained for one month after the programme as per our safeguarding policy and then deleted. This data is managed in line with their privacy policy here:

<https://www.vedamo.com/page/id/3/>

- **ImpactEd**

ImpactEd operates a secure, cloud-based platform which processes data in order to support school-led monitoring and evaluation. Partner schools agree to ImpactEd’s Data Sharing Agreement outlined in their contract with Future Frontiers. This is available here:

https://drive.google.com/file/d/1rploeddSgVdSN44-P0UvvOfdfsjUBy_/view

- **Third Party Giving Platforms**

If you choose to donate to Future Frontiers via a third party, your data will be processed by them and then shared with us. Please see the relevant privacy notice for the giving platform you are using.

On our website, you may find links to the websites of third-party organisations (sponsors, partners, etc). These sites should all have their own privacy notices and as such we are not responsible or liable for any issues you may encounter, should you share personal information with them.

Data security

We will take all reasonable precautions to protect and secure your personal information regardless of whether it is obtained online or offline.

Future Frontiers is registered with the ICO. If a personal data breach results in a likely risk to people’s rights and freedoms, Future Frontiers will notify the ICO no later than 72 hours after becoming aware of it.

Your rights

In some cases, we may hold unidentifiable personal data (for example when working with anonymised data from the National Pupil Database). The rights below relate only to personal information that we are the data controller for and that can be identified as relating to a specific person.

Requesting to be informed of what we do with the information we hold about you

If you wish to receive details on how we collect, process, store and analyse any personal data we hold about you, please contact us at info@futurefrontiers.org.uk.

Requesting access to, or rectification of, the information we hold about you

If you wish to access or amend any personal data we hold about you, subject to you providing us with relevant proof of identity, please contact us at Future Frontiers, CAN Mezzanine, 7-14 Great Dover Street, London, SE1 4YR, or email info@futurefrontiers.org.uk.

Requesting that we erase the information we hold about you

If you wish for us to remove the information we hold about you, please email us at info@futurefrontiers.org.uk. We will delete your data within one month of receiving your request, subject to the conditions discussed above. You may also request that we no longer send you marketing information by selecting the “unsubscribe” link at the bottom of our email newsletters or by emailing us at info@futurefrontiers.org.uk.

Restricting or objecting to the processing of information we hold about you

If you wish to restrict or object to our processing of any personal data we hold about you, please contact us at info@futurefrontiers.org.uk.

Requesting that we transfer information we hold about you

If you wish to request that we transfer any personal data we hold about you to you or another data controller, please contact us at info@futurefrontiers.org.uk explaining the legal basis for the transfer of data.

Requesting not to be subject to a decision based on automated processing

If you wish to request not to be the subject of decision making based on automated processing, including profiling, please contact us at info@futurefrontiers.org.uk. However, note that we do not currently carry out any automated decision making based on the personal data we are the data controller for.

About Future Frontiers

Future Frontiers is a registered charity, no. 1162470.

Future Frontiers LTD is a company limited by guarantee, no. 08825219.

Future Frontiers Ltd is registered with the Information Commissioner’s Office, registration reference: ZA833854

Our registered address is: Future Frontiers, CAN Mezzanine, 7-14 Great Dover Street, London, SE1 4YR.

How to complain

We hope we can resolve any query or concern you raise about our use of your information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this Privacy Notice

This Privacy Notice was published on 4th April 2022 and will be reviewed in October 2022. We may change this Privacy Notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.